

# **EXHIBIT 6**

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

STATES OF NEW YORK,  
MASSACHUSETTS,  
WASHINGTON, COLORADO,  
CONNECTICUT, DELAWARE,  
DISTRICT OF COLUMBIA,  
HAWAII, ILLINOIS, IOWA, NEW  
MEXICO, NORTH CAROLINA,  
OREGON, PENNSYLVANIA,  
RHODE ISLAND, VERMONT, and  
VIRGINIA,

Plaintiffs,

v.

DONALD TRUMP, in his official capacity as President of the United States; U.S. DEPARTMENT OF HOMELAND SECURITY; ELAINE C. DUKE, in her official capacity; U.S. CITIZENSHIP AND IMMIGRATION SERVICES; U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT; and the UNITED STATES OF AMERICA,

CIVIL ACTION NO. 1:17-cv-05228  
(NGG) (JO)

Defendants.

**Declaration of Cesar Andrade**

Pursuant to 28 U.S.C. § 1746(2), I, Cesar Alberto Andrade Chiriboga, hereby declare as follows:

1. I am over the age of 18. I have personal knowledge of the matters stated herein, and if called as a witness, I could and would testify competently thereto.
2. I am a twenty-five year old New York City resident.
3. In 2001, when I was eight years old, I came to New York City from Ecuador.
4. I arrived in Washington Heights, a neighborhood in New York City. I immediately entered the public school system in New York.
5. My interest in practicing medicine was sparked at sixteen when I had the opportunity to volunteer at a hospital, which treated cancer patients.
6. In 2010, I was accepted into the Macaulay Honors College at the City University of New York (“CUNY”) Lehman College. Due to my undocumented immigration status, I was ineligible to receive any financial assistance or grants to fund my education. However, through my outstanding academic performance and achievements, I was awarded a scholarship covering the full cost of tuition. I majored in molecular biology and was a pre-med student. In addition, I was a member of my college’s tennis and soccer teams. In 2011, I was part of a soccer team that won the first CUNY championship for my college. Being a student athlete gave me the opportunity to learn how to successfully balance multiple obligations.
7. DACA did not exist during the first two years of my education at CUNY. Therefore, for those first two years of my education at CUNY, I was unable to intern anywhere. Without a social security number I was prevented from applying to internships and volunteering at hospitals, both of which are a requirement for applying to medical school.
8. In 2012, DACA was enacted and I applied that same year and received DACA status in March 2013. When I attained DACA status, I received a social security number and work authorization,

both of which allowed me to have access to previously unattainable healthcare and employment options.

9. During my college years, I also became a DACA advocate and worked in clinics to spread awareness of the program and promote enrollment into the program among the undocumented community.
10. In 2014, I graduated from CUNY with a bachelor's degree in molecular biology. After graduation, my DACA status allowed me the opportunity to intern for one year at the New York State Health Foundation. While there, I helped lead a public education campaign that spread awareness that DACA grantees are eligible for Medicaid health insurance. As part of this campaign, I worked with the Community Service Society, an advocacy group that addresses the roots of economic disparity, to pair DACA grantees with enrollment navigators who assisted their enrollment in Medicaid. I was involved in every aspect of this campaign, including – handing out flyers, placing flyers online and appearing at events where I would speak directly to community members. This campaign was organized in partnership with the Mayor's Office of Immigrant Affairs.
11. I also participated in Pre-Health Dreamers, a community of undocumented students in America who wish to pursue careers in healthcare. I actively worked on the Pre-Health Dreamer campaign to amend New York City laws to allow non-citizens to receive licenses in professional careers as long as they complete all other required licensure or certification requirements.
12. After my internship at the New York State Health Foundation, I worked at Mt. Sinai hospital in New York City for a year conducting research on diabetes prevention. Specifically, I researched the social determinants of diabetes and how to address them.

13. In 2016, I applied for and was accepted into medical school. I am currently a second year medical student at the Icahn School of Medicine at Mt. Sinai. I was fortunate enough to receive a significant scholarship from my medical school. Without the scholarship, I could not have afforded the cost of medical school. As an undocumented immigrant, I am ineligible to receive federal government assistance and I cannot finance my medical education on my own.

14. I renewed my DACA status in January 2017 for the duration of at least the next two years.

15. Any revocation of DACA would have a huge impact on my life. First, if I lose my DACA status, I will lose my health insurance and my ability to work or intern in the United States. This will impact my ability to complete my medical training. For example, in two years I will have to apply for residency. Without DACA status, I will be unable to get work authorization in order to participate in any residency program. I know I have the support of those at my current academic institution, and other DACA advocates; however, there is no certainty of any favorable outcome. In addition, on a personal level – revocation of DACA would impact my sister and her ability to work as well, which would potentially add more hardship and stress to my family. I am truly unclear about our future without DACA.

16. If I have to, I will consider completing my medical training in another country. However, my first preference is to have the opportunity to give back to this country, and to the communities and academic institutions, which have supported me throughout my life. Allowing DACA to continue would allow my sister and I to continue to live, work, and contribute to the economy and communities of America; where we have spent most of our lives.

17. I was attracted to the medical profession, because I grew up seeing the lack of access to healthcare in underserved communities, particularly among undocumented immigrants. I saw firsthand how a lack of primary care can harm a community. I want to become a primary care doctor so I can help fill that gap in healthcare access, and make a difference in underserved communities.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 5th day of September, 2017

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/s  
Cesar Andrade